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15 Attorneys for Plaintiff JENS ERIK SORENSEN,
16 as Trustee of SORENSEN RESEARCH AND
17 DEVELOPMENT TRUST

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UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF CALIFORNIA

JENS ERIK SORENSEN, as Trustee of) Case No. 08 cv 309 BTM CAB
SORENSEN RESEARCH AND)
DEVELOPMENT TRUST,) SECOND AMENDED NOTICE OF
Plaintiff) RELATED CASES
v.)
CENTRAL PURCHASING, LLC, a)
California Corporation; and DOES 1 –)
100,)
Defendants.)
and related counterclaims.)

1 Pursuant to Local Civil Rule 40.1(e), Plaintiff JENS E. SORENSEN, as
 2 TRUSTEE OF THE SORENSEN RESEARCH AND DEVELOPMENT TRUST
 3 (“SRDT”), hereby gives SECOND AMENDED NOTICE OF RELATED CASES
 4 notice of cases related to the present case. Specifically, SRD TRUST gives notice of
 5 the following related cases that all arise from alleged infringement of United States
 6 Patent Number 4,935,184 (“the ‘184 patent”), whether pending, dismissed, or
 7 otherwise terminated:

8

9 **JUDGMENT ENTERED**

10 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
 11 *Trust v. First International Digital, Inc., et al*, Case No. 3:07-cv-5525-JSW, filed
 12 October 30, 2007 in the United States District Court for the Northern District of
 13 California. Judgment of \$500,000.00 has been entered.

14

15 **PENDING – NOT STAYED**

16 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
 17 *Trust v. Conair Corporation*, Case No. 08cv1256, filed July 11, 2008 in the United
 18 States District Court for the District of Southern California. Plaintiff alleges
 19 infringement of the ‘184 patent by Defendants. Assignment to the same district
 20 judge as other ‘184 patent cases in the district has already occurred.

21 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
 22 *Trust v. Phillips Plastics Corp.*, Case No. C08-03094, filed June 26, 2008 in the
 23 United States District Court for the District of Northern California. Plaintiff alleges
 24 infringement of the ‘184 patent by Defendants. A motion to transfer this case is
 25 pending. A request to relate this case to others in the Northern District was denied.

26 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
 27 *Trust v. Human Touch LLC, et al*, Case No. 08cv1080, filed June 18, 2008 in the
 28 United States District Court for the District of Southern California. Plaintiff alleges

1 infringement of the '184 patent by Defendants. Assignment to the same district
2 judge as other '184 patent cases in the district has already occurred.

3 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
4 *Trust v. Lexar Media, Inc.*, Case No. 5:08-cv-00095-JW, filed January 7, 2008 in the
5 United States District Court for the District of Northern California. Plaintiff alleges
6 infringement of the '184 patent by Defendants. A requested stay has already been
7 denied and this case is proceeding towards trial.

8 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
9 *Trust v. Johnson Level & Tool Mfg. Co., Inc.*, Case No. 3:08-cv-0025-BTM-CAB,
10 filed January 4, 2008 in the United States District Court for the District of Southern
11 California. Plaintiff alleges infringement of the '184 patent by Defendants.
12 Assignment to the same district judge as other '184 patent cases in the district has
13 already occurred.

14 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
15 *Trust v. Ampro Tools Corporation*, Case No. 4:08-cv-00096-CW, filed January 7,
16 2008 in the United States District Court for the District of Northern California.
17 Plaintiff alleges infringement of the '184 patent by Defendants. A default judgment
18 motion is pending.

19 *PowerStation LLC, et al v. Sorensen Research and Development Trust*, Case
20 No. 07-cv-04167-RBH, filed December 31, 2007 in the United States District Court
21 for the District of South Carolina. Plaintiff seeks declaratory judgment that the '184
22 patent is invalid and not infringed by them, and also makes an unfair trade practices
23 claim. A Rule 12 motion for transfer for lack of personal jurisdiction is under
24 submission.

25 *Big Lots Stores, Inc. v. Sorensen Research and Development Trust*, Case. No.
26 08cv00506, filed May 23, 2008 in the United States District Court for the Southern
27 District of Ohio. Plaintiff seeks declaratory judgment that the '184 patent is invalid
28 and not infringed by them. No summons or complaint have been served, and this

1 case will be the subject of a Rule 12 motion for transfer for lack of personal
2 jurisdiction.

3 *Freshlink Product Development, L.L.C. v. Sorensen Research & Development*
4 *Trust*, Case. No. 08cv05021, filed May 30, 2008 in the USDC for the Southern
5 District of New York. No summons or complaint have been served, and this case
6 will be the subject of a Rule 12 motion for transfer for lack of personal jurisdiction.

7 *American Safety Razor Co. v. Sorensen Research & Development Trust*, Civil
8 Case No. 07-CV-00730-HHK, filed April 20, 2007, in the United States District
9 Court for the District of Columbia. No summons or complaint have been served, and
10 this case will be the subject of a Rule 12 motion for transfer for lack of personal
11 jurisdiction.

12 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
13 *Trust v. DMS Holdings, Inc., et al.*, Case No. 08cv559, filed March 25, 2008 in the
14 United States District Court for the District of Southern California. Plaintiff alleges
15 infringement of the '184 patent by Defendants. Assignment to the same district
16 judge as other '184 patent cases in the district has already occurred.

17 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
18 *Trust v. Alltrade Tools, LLC., et al.*, Case No. 08cv232, filed February 5, 2008 in the
19 United States District Court for the District of Southern California. Plaintiff alleges
20 infringement of the '184 patent by Defendants. Assignment to the same district
21 judge as other '184 patent cases in the district has already occurred.

23 PENDING - STAYED

24 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
25 *Trust v. Metabo Corporation, et al.*, Case No. 08cv304, filed February 15, 2008 in
26 the United States District Court for the District of Southern California. Plaintiff
27 alleges infringement of the '184 patent by Defendants. Assignment to the same
28 district judge as other '184 patent cases in the district has already occurred.

1 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
2 *Trust v. Star Asia, U.S.A., LLC, et al.*, Case No. 08cv307, filed February 15, 2008 in
3 the United States District Court for the District of Southern California. Plaintiff
4 alleges infringement of the '184 patent by Defendants. Assignment to the same
5 district judge as other '184 patent cases in the district has already occurred.

6 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
7 *Trust v. Kyocera International, Inc., et al.*, Case No. 08cv411, filed March 4, 2008 in
8 the United States District Court for the District of Southern California. Plaintiff
9 alleges infringement of the '184 patent by Defendants. Assignment to the same
10 district judge as other '184 patent cases in the district has already occurred.

11 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
12 *Trust v. Central Purchasing, LLC, et al.*, Case No. 08cv309, filed February 15, 2008
13 in the United States District Court for the District of Southern California. Plaintiff
14 alleges infringement of the '184 patent by Defendants. Assignment to the same
15 district judge as other '184 patent cases in the district has already occurred.

16 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
17 *Trust v. Logitech, Inc., et al.*, Case No. 08cv308, filed February 15, 2008 in the
18 United States District Court for the District of Southern California. Plaintiff alleges
19 infringement of the '184 patent by Defendants. Assignment to the same district
20 judge as other '184 patent cases in the district has already occurred.

21 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
22 *Trust v. Rally Manufacturing, Inc., et al.*, Case No. 08cv302, filed February 15, 2008
23 in the United States District Court for the District of Southern California. Plaintiff
24 alleges infringement of the '184 patent by Defendants. Assignment to the same
25 district judge as other '184 patent cases in the district has already occurred.

26 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
27 *Trust v. Sunbeam Products, Inc., et al.*, Case No. 08cv306, filed February 15, 2008 in
28 the United States District Court for the District of Southern California. Plaintiff

1 alleges infringement of the '184 patent by Defendants. Assignment to the same
2 district judge as other '184 patent cases in the district has already occurred.

3 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
4 *Trust v. CTT Tools, Inc., et al.*, Case No. 08cv231, filed February 5, 2008 in the
5 United States District Court for the District of Southern California. Plaintiff alleges
6 infringement of the '184 patent by Defendants. Assignment to the same district
7 judge as other '184 patent cases in the district has already occurred.

8 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
9 *Trust v. Global Machinery Company, et al.*, Case No. 08cv233, filed February 5,
10 2008 in the United States District Court for the District of Southern California.
11 Plaintiff alleges infringement of the '184 patent by Defendants. Assignment to the
12 same district judge as other '184 patent cases in the district has already occurred.

13 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
14 *Trust v. Emissive Energy Corp., et al.*, Case No. 08cv234, filed February 5, 2008 in
15 the United States District Court for the District of Southern California. Plaintiff
16 alleges infringement of the '184 patent by Defendants. Assignment to the same
17 district judge as other '184 patent cases in the district has already occurred.

18 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
19 *Trust v. Motorola, Inc., et al.*, Case No. 3:08-cv-0136 LAB RBB, filed January 23,
20 2008 in the United States District Court for the District of Southern California.
21 Plaintiff alleges infringement of the '184 patent by Defendants. Assignment to the
22 same district judge as other '184 patent cases in the district has already occurred.

23 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
24 *Trust v. Sanyo North America Corporation, et al.*, Case No. 3:08-cv-0135 DMS
25 POR, filed January 23, 2008 in the United States District Court for the District of
26 Southern California. Plaintiff alleges infringement of the '184 patent by Defendants.
27 Assignment to the same district judge as other '184 patent cases in the district has
28 already occurred.

1 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
2 *Trust v. Informatics, inc., et al.*, Case No. 3:08-cv-0134-L NLS, filed January 23,
3 2008 in the United States District Court for the District of Southern California.
4 Plaintiff alleges infringement of the '184 patent by Defendants. Assignment to the
5 same district judge as other '184 patent cases in the district has already occurred.

6 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
7 *Trust v. Ryobi Technologies, Inc., et al.*, Case No. 3:08-cv-0070-BTM-CAB, filed
8 January 11, 2008 in the United States District Court for the District of Southern
9 California. Plaintiff alleges infringement of the '184 patent by Defendants.
10 Assignment to the same district judge as other '184 patent cases in the district has
11 already occurred.

12 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
13 *Trust v. Senco Products, Inc.*, Case No. 3:08-cv-0071-BTM-CAB, filed January 11,
14 2008 in the United States District Court for the District of Southern California.
15 Plaintiff alleges infringement of the '184 patent by Defendants. Assignment to the
16 same district judge as other '184 patent cases in the district has already occurred.

17 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
18 *Trust v. Emerson Electric Co., et al.*, Case No. 3:08-cv-0060-BTM-CAB, filed
19 January 10, 2008 in the United States District Court for the District of Southern
20 California. Plaintiff alleges infringement of the '184 patent by Defendants.
21 Assignment to the same district judge as other '184 patent cases in the district has
22 already occurred.

23 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
24 *Trust v. Energizer Holdings, Inc., et al.*, Case No. 3:07-CV-2321-BTM-CAB, filed
25 December 11, 2007 in the United States District Court for the Southern District of
26 California. Plaintiff alleges infringement of the '184 patent by Defendants.
27 Assignment to the same district judge as other '184 patent cases in the district has
28 already occurred.

1 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
2 *Trust v. Giant International, Inc., et al*, Case No. 3:07-CV-2121-BTM-CAB, filed
3 November 6, 2007 in the United States District Court for the Southern District of
4 California. Plaintiff alleges infringement of the '184 patent by Defendants.
5 Assignment to the same district judge as other '184 patent cases in the district has
6 already occurred.

7 *Jens Erik Sorensen as Trustee of Sorensen Research and Development Trust v.*
8 *Esseplast (USA) NC, Inc., et al*, Case No. 3:07-cv-2277-BTM-CAB, filed December
9 4, 2007 in this District. Plaintiff alleges infringement of the '184 patent by
10 Defendants. Assignment to the same district judge as other '184 patent cases in the
11 district has already occurred.

12 *Jens Erik Sorensen as Trustee of Sorensen Research and Development Trust v.*
13 *Helen of Troy Texas Corporation, et al*, Case No. 3:07-cv-2278-BTM-CAB, filed
14 December 4, 2007 in this District. Plaintiff alleges infringement of the '184 patent
15 by Defendants. Assignment to the same district judge as other '184 patent cases in
16 the district has already occurred.

17 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
18 *Trust v. Digital Networks North America, Inc., et al*, Case No. 3:07-5568-JSW, filed
19 November 1, 2007 in the United States District Court for the Northern District of
20 California. Plaintiff alleges infringement of the '184 patent by Defendants. The
21 Northern District has already reviewed whether this case was related to other '184
22 patent cases in the Northern District and found it was not.

23 *Jens Erik Sorensen as Trustee of the Sorensen Research and Development*
24 *Trust v. The Black & Decker Corporation, et al*, Civil Case No.: 3:06-CV-1572-
25 BTM-CAB, filed August 7, 2006, in the United States District Court for the Southern
26 District of California. Plaintiff alleges infringement of the '184 patent by
27 Defendants. Assignment to the same district judge as other '184 patent cases in the
28 district has already occurred.

SETTLED AND DISMISSED

Jens Erik Sorensen as Trustee of the Sorensen Research And Development Trust v. Tecnica USA, Inc and Nordica USA, Inc., Civil Case No. 06CV1941 B MLS, filed September 18, 2006 in the Southern District of California. The action was settled by the parties, and dismissed.

Jens Erik Sorensen As Trustee of The Sorensen Research And Development Trust v. Head USA Inc. Civil Case No.: 06CV1434BTN CAB, filed July 2006 in the Federal District for the Southern District of California. The action was settled by the parties, and dismissed.

Head USA Inc. v. Jens Erik Sorensen (As Trustee of The Sorensen Research And Development Trust), and Sorensen Research And Development Trust. Docket No.: 306CV00983, filed June 2006 in the Federal District of Connecticut. The matter was transferred and consolidated with the *Sorensen Research And Development Trust v. Head USA Inc.* action filed in the Southern District of California, Civil Case No.: 06CV1434BTM CAB. The action was later settled by the parties, and dismissed.

Nordica USA Corp. v. Jens Ole Sorensen, Jens Erik Sorensen, and Sorensen Research and Development Trust. Docket No. 1:06-cv-91-JM filed March 8, 2006 in the Federal District of New Hampshire. The matter was transferred and consolidated with *Jens Erik Sorensen As Trustee of The Sorensen Research And Development Trust v. Tecnica USA, Inc and Nordica USA, Inc.*, Civil Case No. 06CV1941 B MLS, filed in the Southern District of California. The action was later settled by the parties.

Jens Ole Sorensen, and Jens E. Sorensen, as Trustee Of The Sorensen Research and Development Trust v. DaimlerChrysler AG, and Mercedes-Benz USA, LLC. Civil No. 03-1763 (HAA) filed in the United States District Court for Northern California and transferred to the United States District Court for New

Jersey. This matter has been settled and dismissed.

In the Matter of Certain Automobile Tail Light Lenses And Products Incorporating Same. Investigation No. 337-TA-502 filed in the United States International Trade Commission. The matter was remanded after appeal to the Federal Circuit Court of Appeals, then settled and dismissed.

Jens E. Sorensen, as Trustee Of The Sorensen Research and Development Trust v. Premier Automotive Group, Ford Motor Company, and Jaguar, Ltd. Case No. 03-cv-01107, filed March 14, 2003 in the Federal Court for the Northern District of California. The matter was settled and dismissed.

Sorensen et al v. International Trade Commission et al., 427 F.3d 1375 (Fed. Cir. 2005). After the Federal Circuit ruled in patentee's favor, the parties settled and dismissed.

DISMISSED

DMS Holdings, Inc. v. Sorensen Research & Development Trust. Civil Case No.: 07-CV-02690, filed May 11, 2007, in the United States District Court for the Northern District of Illinois. This case has been dismissed. Sorensen filed against DMS Holdings in the United States District Court for Southern California (see above).

Lowe's Companies, Inc., et al v. Sorensen Research and Development Trust.
Case No. 05-cv-00234 filed July 29, 2005 in the Federal Court for the Western
District of North Carolina. The matter was never served and was dismissed.

Digital Innovations LLC v. Sorensen Research and Development Trust. Case No. 05-cv-06428, filed November 9, 2005 in the Federal Court for the Northern District of Illinois. The matter was never served and was dismissed.

Big Lots v. Sorensen Research and Development Trust. Case No. 2:06-cv-1089, filed December 29, 2006 in the Federal Court for the Southern District of Ohio. The matter was never served and was dismissed.

1 *Bon-Aire v. Sorensen Research and Development Trust.* Case No. 07-cv-054-
2 S, filed January 2007 in the Federal Court for the District of Idaho. The matter was
3 never served and was dismissed.

4 *Husqvarna Outdoor Products, Inc. v. Sorensen Research and Development*
5 *Trust.* CIV. NO. CV106-160 in the Federal Court for the Southern District of
6 Georgia on October 30, 2006. The matter was never served and was dismissed.

7
8 DATED this Monday, September 15, 2008.
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10 JENS ERIK SORENSEN, as Trustee of
11 SORENSEN RESEARCH AND DEVELOPMENT
12 TRUST, Plaintiff

13 _____
14 /s/ Melody A. Kramer
15 Melody A. Kramer, Esq.
16 J. Michael Kaler
17 Attorney for Plaintiff

PROOF OF SERVICE

I, Melody A. Kramer, declare: I am and was at the time of this service working within in the County of San Diego, California. I am over the age of 18 year and not a party to the within action. My business address is the Kramer Law Office, Inc., 9930 Mesa Rim Road, Suite 1600, San Diego, California, 92121.

On Monday, September 15, 2008, I served the following documents:

SECOND AMENDED NOTICE OF RELATED CASES

PERSON(S) SERVED	PARTY(IES) SERVED	METHOD OF SERVICE
Mark J. Rosenberg Sills Cummis & Gross P.C. One Rockefeller Plaza New York, New York 10020	Central Purchasing, LLC	Email - Pleadings Filed with the Court via ECF
Susan E. Basinger Higgs Fletcher & Mack LLP 401 West "A" Street, Suite 2600 San Diego, California 92101 basinger@higgslaw.com	Central Purchasing, LLC	Email - Pleadings Filed with the Court via ECF

(Email--Pleadings Filed with the Court) Pursuant to Local Rules, I electronically filed this document via the CM/ECF system for the United States District Court for the Southern District of California.

□ (U.S. Mail) I mailed a true copy of the foregoing documents to a mail address represented to be the correct mail address for the above noted addressee.

I declare that the foregoing is true and correct, and that this declaration was executed on Monday, September 15, 2008, in San Diego, California.

/s/ Melody A. Kramer

Melody A. Kramer